

UNITED STATES DISTRICT COURT
for the
Western District of Texas

FILEDSeptember 20, 2023
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America)
v.)
Raymundo Rene FAUDOA-Solis) Case No.
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)
Defendant(s)

BY: Fidel Morales
DEPUTY**EP:23-M-03032-MAT****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 19, 2023 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

Title 18 U.S.C. § 554(a)

Whoever fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to-wit: approximately 1875 rounds of ammunition.

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Complaint sworn to telephonically on
September 20, 2023 at 02:00 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

Sworn to before me and signed in my presence.

Date: 09/20/2023

City and state: El Paso, Texas


Complainant's signature
Jaime Acosta, HSI Task Force Officer
Printed name and title


Judge's signature
Miguel A. Torres, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

Your affiant makes this affidavit based on his knowledge as well as information provided by other law enforcement officers. Your affiant has not included each and every fact known concerning this investigation. Your affiant has set forth only the facts necessary to establish probable cause for the arrest of Raymundo Rene FAUDOA-Solis.

On September 19, 2023, at approximately 10:37 a.m., Raymundo Rene FAUDOA-Solis (“FAUDOA”) entered the United States (U.S.) from Mexico at the Ysleta Port of Entry in El Paso, Texas. FAUDOA was the driver and sole occupant of a black Dodge Nitro bearing Mexico license plates. Immigration records reflected that FAUDOA had been issued a nonimmigrant visa (B1/B2/Border Crossing Card) and FAUDOA was not a citizen or Lawful Permanent Resident of the U.S.

On September 19, 2023, U.S. Customs and Border Protection Officers (CBPOs) were conducting outbound inspection operations at the Ysleta Port of Entry in El Paso, Texas. On September 19, 2023, at approximately 1:25 p.m., a CBPO selected a black Dodge Nitro bearing Mexico plates for inspection as the vehicle attempted to depart the U.S. to Mexico. The CBPO asked the driver and sole occupant of the vehicle, FAUDOA, where he was headed and FAUDOA replied he was traveling home to Juarez, Mexico. FAUDOA told the CBPO he was in El Paso for a few hours having lunch at Peter Piper Pizza. FAUDOA stated he was the owner of the vehicle and provided a negative Customs declaration to the CBPO for firearms, and currency over ten thousand dollars (\$10,000.00).

The CBPO asked FAUDOA if he had any ammunition in the vehicle and FAUDOA replied yes. FAUDOA then stated there was ammunition under the hood of the vehicle. The CBPO asked FAUDOA if he knew that the exportation of ammunition and firearms into Mexico was illegal and FAUDOA stated he was aware it was illegal.

Further inspection of the vehicle resulted in the discovery of approximately one thousand five hundred seventy-five (1575) rounds of .22 Long Rifle ammunition, two hundred (200) rounds of 30-30 Winchester ammunition, sixty (60) rounds of 30-06 Springfield ammunition, and forty (40) rounds of 270 Winchester ammunition concealed in the engine compartment of the vehicle. The total quantity of ammunition seized was approximately one thousand eight hundred seventy-five (1875) rounds. During the inspection of the vehicle and subsequent pat-down of FAUDOA, CBPOs discovered two (2) receipts from Academy Sports and Outdoors.

FAUDOA was advised of his Miranda Rights by Homeland Security Investigations (HSI) Task Force Officer (TFO) Jaime Acosta in the Spanish language and witnessed by HSI Special Agents (SAs) Charles Bachhuber and Gabrielle Moore. FAUDOA declined to be interviewed by the HSI TFO and SAs.

TFO Acosta reviewed the two (2) Academy Sports and Outdoor receipts. TFO Acosta observed that one (1) receipt, dated September 19, 2023, at 1:00 p.m., reflected the purchase of two hundred (200) rounds of 30-30 Winchester ammunition, sixty (60) rounds of 30-06 Springfield ammunition, and forty (40) rounds of 270 Winchester ammunition. TFO Acosta observed that the second receipt, dated September 19, 2023, at 1:03 p.m., reflected the purchase of one thousand five hundred seventy-five (1575) rounds of .22 Long Rifle ammunition.

AFFIDAVIT

Your affiant is aware that ammunition is controlled for export to Mexico on the Commerce Control List. Your affiant is also aware that a license, issued by the U.S. Department of Commerce, is required for the export of ammunition to Mexico. On September 19, 2023, an HSI SA queried a law enforcement database and was unable to locate any information which suggested that FAUDOA possessed an export license relating to the export of ammunition.



Jaime Acosta, HSI Task Force Officer